## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re :

Chapter 13

CLAUDIA A. NESMITH

:

Case No. 24-14391(AMC)

Debtor. :

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# ENTRY OF APPEARANCE OF THE CITY OF PHILADELPHIA COMBINED WITH DEMAND FOR SERVICE OF PAPERS

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly enter the appearance of PAMELA ELCHERT THURMOND, Esquire as counsel of record for creditor The City of Philadelphia and/or Water Revenue Bureau, where applicable, in the above-captioned matter.

PLEASE TAKE NOTICE that the City of Philadelphia and/or Water Revenue Bureau, (the "City"), a creditor and party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Pamela Elchert Thurmond, Senior Attorney; such counsel hereby enters their appearance pursuant to Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code") and Fed. R. Bankr. P. 9010 (b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007 and § 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the captioned case and served upon the City and to the attorney at the address and telephone number set forth below.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Creditor's rights: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to trial by jury in any proceeding so triable in

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this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Creditor is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Creditor expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: June 5, 2025 By: /s/ Pamela Elchert Thurmond

PAMELA ELCHERT THURMOND

Senior Attorney

PA Attorney I.D. 202054

Attorney for the City of Philadelphia

and/or

Water Revenue Bureau

City of Philadelphia Law Department

Municipal Services Building 1401 JFK Boulevard, 5<sup>th</sup> Floor Philadelphia, PA 19102-1595

215-686-0508 (phone)

Email: Pamela.Thurmond@phila.gov

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Entry of Appearance of the City of Philadelphia was served by the means designated below, on the date set forth below, upon the following parties:

#### Via ECF Filing Notice:

Chapter 13 Trustee KENNETH E. WEST Office of the Chapter 13 Standing Trustee 190 N. Independence Mall West – Suite 701 Philadelphia, PA 19106

United States Trustee Office of United States Trustee Robert N.C. Nix Federal Building 900 Market Street – Suite 320 Philadelphia, PA 19106

#### Debtor's Counsel:

MICHAEL A. CIBIK Cibik Law, P.C. 1500 Walnut Street –Suite 900 Philadelphia, PA 19102

#### Via USPS Mail Delivery:

Claudia A. Nesmith 7000 N 12th Street Philadelphia, PA 19126-2101

Respectfully submitted,

Date: June 5, 2025 By: /s/ Pamela Elchert Thurmond

PAMELA ELCHERT THURMOND

Senior Attorney

PA Attorney I.D. 202054

City of Philadelphia Law Department